

Presentment Date and Time: May 7, 2009 at 12:00 p.m. (Prevailing Eastern Time)
Objection Deadline: May 6, 2009 at 12:00 p.m. (Prevailing Eastern Time)
Proposed Hearing Date and Time (if required): May 13, 2009 at 10:00 a.m. (Prevailing Eastern Time)

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS INC., <u>et al.</u> ,	:	Case No. 08-13555 (JMP)
	:	
Debtors.	:	(Jointly Administered)
-----X	:	

**NOTICE OF PRESENTMENT OF (1) CONFIDENTIALITY STIPULATION AND
PROTECTIVE ORDER BETWEEN THE EXAMINER AND BARCLAYS CAPITAL
INC. AND (2) STIPULATION AND AGREED ORDER BETWEEN THE EXAMINER
AND BARCLAYS CAPITAL INC. CONCERNING DATA ACCESS**

PLEASE TAKE NOTICE that the undersigned will present the Confidentiality Stipulation and Protective Order Between the Examiner and Barclays Capital Inc. (attached hereto as Exhibit A) (the "Proposed Protective Order") and the Stipulation and Agreed Order Between the Examiner and Barclays Capital Inc. Concerning Data Access (attached hereto as

Exhibit B) (the “Proposed Data Access Order”) to the Honorable James M. Peck, United States Bankruptcy Judge, for signature on May 7, 2009, at 12:00 p.m. (Prevailing Eastern Time).¹

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Proposed Protective Order and/or Proposed Data Access Order must comply with the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the Local Rules of the United States Bankruptcy Court for the Southern District of New York, shall set forth the name of the objecting party, the basis for the objection and the specific grounds thereof, shall be filed with the Bankruptcy Court electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court’s case filing system and by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), Microsoft Word, or any other Windows-based word processing format (with two hard copies delivered directly to Chambers), and shall be served upon: (i) the chambers of the Honorable James M. Peck, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) Weil Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153, (Attn: Richard P. Krasnow, Esq., Lori R. Fife, Esq., Shai Y. Waisman, Esq., and Jacqueline Marcus, Esq.), attorneys for the Debtors; (iii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Andy Velez-Rivera, Esq., Paul Schwartzberg, Esq., Brian Masumoto, Esq., Linda Riffkin, Esq., and Tracy Hope Davis, Esq.); (iv) Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005, (Attn: Dennis F. Dunne, Esq., Dennis O’Donnell, Esq., and Evan Fleck, Esq.), attorneys for the Official Committee of Unsecured Creditors; (v) Jenner & Block

¹ A copy of the letter agreement between the Examiner and Barclays Capital Inc., which is referenced in the Proposed Data Access Order, will be provided to parties in interest upon execution of a confidentiality agreement acceptable to Barclays Capital Inc. and the Examiner.

LLP, 919 Third Avenue, 37th Floor, New York, New York 10022-3908, (Attn: Patrick J. Trostle, Esq.), attorneys for the Examiner; and (vi) Boies, Schiller & Flexner, LLP, 575 Lexington Avenue, New York, New York 10022, (Attn: Jack G. Stern), and Cleary Gottlieb Steen & Hamilton LLP, One Liberty Plaza, New York, New York 10006 (Attn: Lindsee P. Granfield), attorneys for Barclays Capital, Inc.; so as to be filed and received by no later than 12:00 p.m. (Prevailing Eastern Time) on May 6, 2009 (the "Objection Deadline").

PLEASE TAKE FURTHER NOTICE that only if a written objection is timely filed and served, the proposed hearing date will be May 13, 2009, at 10:00 am (Prevailing Eastern Time) at the United States Bankruptcy Court for the Southern District of New York, Honorable James M. Peck, United States Bankruptcy Judge, One Bowling Green, New York, New York 10004-1408. If an objection is filed, the moving and objecting parties are required to attend the hearing, and failure to appear may result in relief being granted or denied upon default. If no objections are received by the Objection Deadline, the proposed Stipulation and Order may be signed and entered by the Bankruptcy Court.

Dated: April 30, 2009
New York, New York

Respectfully submitted,

By: /s/ Patrick J. Trostle
Patrick J. Trostle

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